

BIBIYAN LAW GROUP, P.C.

David D. Bibiyan (SBN 287811)

david@tomorrowlaw.com

Vedang J. Patel (SBN 328647)

vedang@tomorrowlaw.com

1460 Westwood Boulevard

Los Angeles, California 90024

Telephone: (310) 438-5555; Facsimile: (310) 300-1705

Attorneys for Plaintiff, ARACELI FUENTES,
on behalf of herself and all others similarly
situated and aggrieved

FILED

Superior Court of California
County of Los Angeles

04/18/2025

David W. Slayton, Executive Officer / Clerk of Court

By: _____ A. He _____ Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES – SPRING STREET COURTHOUSE

ARACELI FUENTES, an individual and on
behalf of all others similarly situated,

Plaintiff,

v.

MAYFLOWER MEDICAL GROUP, INC. a
California Corporation, and DOES 1 through
100, inclusive,

Defendants.

CASE NO.: 22STCV28945

[Assigned for all purposes to the Hon. Stuart
M. Rice, Dept. 1]

**JOINT STIPULATION TO CONTINUE
FINAL APPROVAL HEARING;
~~PROPOSED~~ ORDER**

1 **TO THE COURT AND ALL INTERESTED PARTIES:**

2 Araceli Fuentes (“Plaintiff”) and defendant Mayflower Medical Group, Inc.
3 (“Defendant” and with Plaintiff, “the Parties”), by and through their respective counsel, hereby
4 stipulate and agree to the following:

5 **Recitals**

6 WHEREAS, California Rules of Court, Rule 3.762 *et seq.*, permits the court and
7 counsel for the parties latitude to schedule discovery, hearings, and other matters germane to
8 resolution of the action in the interest of judicial economy and to enter into stipulations accordingly;

9 WHEREAS on November 14, 2024, the Court granted Plaintiff’s Motion for
10 Preliminary Approval of Class and Representative Action Settlement and Provisional Class
11 Certification for Settlement Purposes Only (“Motion for Preliminary Approval”), including the
12 procedures and deadlines described in the Order Granting Preliminary Approval of Class and
13 Representative Action Settlement and Certifying Class for Settlement Purposes Only (“Order”), and
14 set the Final Fairness and Approval Hearing on May 28, 2025, at 10:30 a.m., in the above referenced
15 Court and Department;

16 WHEREAS, pursuant to the Order, the Parties are to provide the required documents
17 to the settlement administrator and thereafter the Defendants are to provide the putative class contact
18 information (the “Class Data”) to the settlement administrator for the purposes of determining the
19 class period, and the class members’ workweeks, and mailing of the Court approved Class Notice;

20 WHEREAS, following the Order, through inadvertent error, the settlement
21 administrator did not receive the required documents to begin administration.

22 WHEREAS, the Parties ultimately discovered the error and promptly provided all
23 documents needed to begin the administration process;

24 WHEREAS, Defendant also required additional time to obtain all necessary data and
25 information for the Class Members and provide it to the settlement administrator;

26 WHEREAS, all documents and data are now prepared for the settlement
27 administrator to proceed with administration and mail the class notice;

28

WHEREAS, the Class Notice shall inform Class Members and Aggrieved Employees of the date, time, and location of the Final Fairness and Approval Hearing;

WHEREAS, pursuant to the Parties' calculations, the class members would not receive sufficient notice in order to opt-out, object, or dispute their workweeks pursuant to the agreement which states Class Members shall have forty-five (45) days after the Settlement Administrator mails the Class Notice to Class Members to mail Requests for Exclusion from the Settlement, or Objections to the Settlement, and Class Members to whom a Class Notice is resent after having been returned to the Settlement Administrator as undeliverable.

WHEREAS, the Parties respectfully request a brief continuance of the Final Approval hearing in order to allow for the administration process to continue and for the Class Members to have sufficient time in order to respond to the Class Notice

Stipulation

NOW, THEREFORE, the Parties agree that the Final Fairness and Approval Hearing on Class Action Settlement be continued seventy-five (75) days, or a date thereafter convenient with the Court, to allow for the Settlement Administrator to mail the Class Notice to Class Members and Aggrieved Employees, for all Class Members adequate time to respond to the Class Notice before the Final Approval Hearing, and for Plaintiff to file the moving papers in support of the Motion for Final Approval of Class and Representative Action Settlement no later than sixteen (16) court days prior to the Final Approval Hearing.

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Dated: April 17, 2025

BIBIYAN LAW GROUP, P.C.

BY: /s/ Vedang J. Patel
VEDANG J. PATEL
Attorneys for Plaintiff ARACELI FUENTES,
on behalf of herself and all others similarly
situated

Dated: April 17, 2025

TURNER DHILLON LLP

BY: /s/ William Turner
WILLIAM TURNER
Attorneys for Defendant MAYFLOWER MEDICAL
GROUP, INC.

~~PROPOSED~~ ORDER

Pursuant to the foregoing stipulation, and good cause appearing, it is hereby ordered as follows:

1. The hearing on the Final Approval Hearing on Class and Representative Action Settlement that is currently scheduled for May 28, 2025 at 10:30 a.m. shall be continued to U&I à\ÁH, 2025, at FEÁHÉ a.m./~~p.m.~~

2. The deadline to file the motion for final approval shall be (16) court days prior to the rescheduled hearing, or Ù\] c\ à\ÁHÉÁÉÁ.

IT IS SO ORDERED.

Date: 07/14/2025



A handwritten signature in black ink, appearing to read "Stuart M. Rice".

Stuart M. Rice / Judge

JUDGE OF THE SUPERIOR COURT

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